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**From:** Mazza, Carl [Mazza.Carl@epa.gov]  
**Sent:** 9/28/2020 5:20:56 PM  
**To:** Bussard, David [Bussard.David@epa.gov]  
**Subject:** FW: Comments on the CRA Document for Consideration  
**Attachments:** CRA Guidelines External Review Draft-cm4 (002).docx

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**From:** Mazza, Carl  
**Sent:** Friday, September 18, 2020 5:55 PM  
**To:** Martin, Lawrence <Martin.Lawrence@epa.gov>; Penalva-Arana, Carolina <Penalva-Arana.Carolina@epa.gov>  
**Cc:** Ohanian, Edward <Ohanian.Edward@epa.gov>; 'Bussard, David' <Bussard.David@epa.gov>; Maria Doa (Doa.Maria@epa.gov) <Doa.Maria@epa.gov>  
**Subject:** Comments on the CRA Document for Consideration

As mentioned at the last SSP mtg OAR (Betsy Shaw) will, and by now has, concurred on the decision to peer review the CRA Document. Getting STPC agreement to get this document into peer review is a major accomplishment of the workgroup and the Forum.

The attached markup represents my own separate review/comments which may be applicable now, or when we are developing a final document. While I hope the drafters will consider them I assume (with respect to these comments especially) that they are the final arbiter of the documents content.

A theme that underlies many of my comments in the concern that CRAs (whether to do them and when) is often framed as a yes/no decision. Doing so creates the impression and expectation that they are too complex and resource intensive to consider, when in fact there are elements of CRA that are warranted and tractable in a variety of assessments. Given the broad range of assessment done by the Agency, a question of using a "CRA approach" does not fit into a yes/no decision framework.

To encourage more active consideration of CRA in Agency assessments, we should consider, as we move make revisions post PR, whether a shorter and less "narrative" document would better serve the needs of the Agency.

Thanks  
Carl

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